

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

4. The Association is a secured creditor of the Debtor, holding a statutory lien for all assessments and other charges due to the Association, and a judgment lien. The statutory lien is

granted by the terms of the Declaration of Condominium and the Pennsylvania Uniform Condominium Act, 68 P.A.C.S. § 3315.

5. The Association's claim is fully secured, by virtue of its statutory lien and its judgment lien.

6. The Association believes that the Debtor is not acting in good faith. Debtor's Schedules do not provide for the full amount of the Association's claim and her Financial Statement does not show sufficient income to pay the Plan after her living expenses.

WHEREFORE, 1600 Church Road Condominium Association respectfully requests that Debtor's Chapter 13 Plan be rejected and that these proceedings be dismissed.

BARROW | HOFFMAN

By: /s/ Hal A. Barrow
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